

Wireline Competition Bureau
Federal Communications Commission
445 12th St., S.W., Room TW-A325
Washington, D.C. 20554

Re: Address Confidentiality and LifeLine, DA-13-2240/WC Docket 11-42

We are filing these comments in response to the Public Notice released November 21, 2013. We urge the FCC to allow for a waiver of certain address rules for LifeLine customers that are participating in state address confidentiality programs. We understand that the Lifeline rules currently require customers that are enrolling in federal Lifeline to provide a residential address to the telecommunications carriers. This address will be used to check a national database for duplicates and verification of Lifeline eligibility. The rules prohibit use of a P.O. Box.

The requirement to provide a residential address and related prohibition on the use of a P.O. Box directly impacts those Lifeline customers who are the victims of domestic violence or abuse or who otherwise may need to rely on the protections of an address confidentiality program. In many cases, the victim's life is in danger and any risk that their current residential address is released would be unacceptable. However, for many of these people Lifeline is a critical benefit that will ensure family and friends can stay connected.

The integrity of the Lifeline program would not be harmed by this waiver. The proposed rules would require the Lifeline eligible customer to provide official documentation that he or she is participating in the address confidentiality program. This requirement would allow the telephone carrier and Lifeline program to still check and flag any potential duplicate accounts.

We appreciate your attention to this matter and urge the FCC to grant this waiver to allow use of a P.O. Box or other shielded residential address due to participation in a state-sponsored address confidentiality program.

Sincerely,



Rebecca Bauen
Executive Director